

**FILED**

OCT 25 2022

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

Criminal No. 22-129

v.

(18 U.S.C. §§ 2251(a) and (e),  
2252(a)(4)(B) and 2252(b)(2),  
2252(a)(2) and 2252(b)(1))

SEAN RYAN MCKENZIE

**SUPERSEDING INDICTMENT**

**COUNT ONE**

The grand jury charges:

On or about June 8, 2021, in the Western District of Pennsylvania, the defendant, SEAN RYAN MCKENZIE, attempted to and did employ, use, persuade, induce, entice, and coerce Minor A, a minor female known to the grand jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct: to wit, a video depicting Minor A engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT TWO**

The grand jury further charges:

On or about March 1, 2022, in the Western District of Pennsylvania, the defendant, SEAN RYAN MCKENZIE, did knowingly possess visual depictions, namely, videos and images in computer graphic and digital files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict prepubescent minors and minors who have not attained 12 years of age engaging in sexually explicit conduct, all of which had been shipped and transported using any means or facility of interstate and foreign commerce, or were produced using materials which had been shipped and transported in interstate and foreign commerce, by any means, including by computer and the Internet.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**COUNT THREE**

The grand jury further charges:

On or about June 5, 2020, in the Western District of Pennsylvania, the defendant, SEAN RYAN MCKENZIE, attempted to and did employ, use, persuade, induce, entice, and coerce Minor A, a minor female known to the grand jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct: to wit, two videos depicting Minor A engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, knowing or having reason to know that such visual depictions would be transported or transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and such visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT FOUR**

The grand jury further charges:

On or about December 13, 2020, in the Western District of Pennsylvania, the defendant, SEAN RYAN MCKENZIE, attempted to and did employ, use, persuade, induce, entice, and coerce Minor A, a minor female known to the grand jury, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct: to wit, a video depicting Minor A engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, knowing or having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT FIVE**

The grand jury further charges:

On or about June 5, 2020, in the Western District of Pennsylvania, and elsewhere, the defendant, SEAN RYAN MCKENZIE, did knowingly transport and attempt to transport any visual depiction of a minor, namely two videos of Minor A, a minor female known to the grand jury, the production of which involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict a minor engaging in sexually explicit conduct, and said visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer and the Internet.

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

**COUNT SIX**

The grand jury further charges:

On or about December 13, 2020, in the Western District of Pennsylvania, and elsewhere, the defendant, SEAN RYAN MCKENZIE, did knowingly transport and attempt to transport any visual depiction of a minor, namely a video of Minor A, a minor female known to the grand jury, the production of which involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict a minor engaging in sexually explicit conduct, and said visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer and the Internet.

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

**COUNT SEVEN**

The grand jury further charges:

On or about February 21, 2021, in the Western District of Pennsylvania, and elsewhere, the defendant, SEAN RYAN MCKENZIE, did knowingly transport and attempt to transport any visual depiction of a minor, namely a video, the production of which involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and which depict a minor engaging in sexually explicit conduct, and said visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer and the Internet.

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

**FORFEITURE ALLEGATIONS**

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to defendant SEAN RYAN MCKENZIE that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 2253, in the event of the defendant's conviction under Counts One through Seven of this Superseding Indictment.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in Counts One through Seven of this Superseding Indictment, in violation of Title 18, United States Code, Sections 2251 and 2252, the defendant, SEAN RYAN MCKENZIE, shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Section 2251, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, or shipped, in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

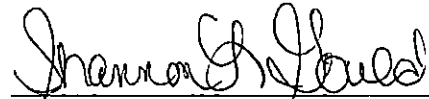
3. The property subject to this forfeiture notice includes, but is not limited to: one (1) Apple iPhone 12 Pro 42341 IMEI: 35378118049773; one (1) SanDisk Xpand Flash Drive 3.0; one Apple iPad A2197 S/N: F9FZHJX3MF3Q; and one Apple iMac desktop computer, S/N: W80084Q8SPL.


4. If any of the property described above, as a result of any act or omission of the defendant,


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A True Bill,

  
FOREPERSON

  
CINDY K. CHUNG  
United States Attorney  
PA ID No. 317227

  
HEIDI M. GROGAN  
Assistant United States Attorney  
PA ID No. 203184